

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

William Jamel,

Plaintiff,

v.

The Bank of Missouri and Equifax
Information Services, LLC,

Defendants.

Case No.:

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to 28 U.S.C. §§ 1331 and 1441 *et seq.*, and 15 U.S.C. § 1681 *et seq.*, defendant The Bank of Missouri (“TBOM”) hereby give notice of removal of this cause of action, under the caption *William Jamel v. The Bank of Missouri and Equifax Information Services, LLC*, from the Superior Court of Fulton County, State of Georgia under Case No.: 2022CV373973 (“State Court Action”) to the United States District Court for the Northern District of Georgia. In support of removal, TBOM, by and through their attorneys, states as follows:

1. William Jamel (“Plaintiff”) filed this action in the Superior Court for Fulton County, Georgia. A copy of the Complaint and state court record is attached and marked as Exhibit “1”.

2. TBOM was served with Plaintiff's Complaint on December 23, 2022.

This removal is timely pursuant to 28 U.S.C. § 1446(b).

3. This Court has original jurisdiction over this civil action under 12 U.S.C. § 1331, and is one which may be removed to this Court by TBOM pursuant to 28 U.S.C. § 1441, as Plaintiff's claims under the Fair Credit Reporting Act present a federal question.

4. Defendant's counsel conferred with co-defendant Equifax Information Services, LLC and Equifax Information Services, LLC consented to removal.

5. Notice of this removal will be filed with the Superior Court of Fulton County, Georgia.

6. By virtue of this Notice of Removal of Action and the Notice filed in the Action, Defendants do not waive their rights to assert any personal jurisdictional defenses or file other pre-answer motions including Federal Rule of Civil Procedure 12 motions and/or motions to compel arbitration as permitted by the Federal Rules of Civil Procedure.

WHEREFORE, Defendants request that further proceedings in the Superior Court of Fulton County, Georgia, be discontinued and that this action be removed in its entirety to the United States District Court for the Northern District of Georgia, which will then assume full jurisdiction over this cause of action.

Respectfully submitted this 23rd day of January 2023.

BEDARD LAW GROUP, PC

/s/ Jonathan K. Aust

Jonathan K. Aust

Georgia Bar No. 448584

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CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing Notice of Removal by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Heather Johnson, Esq.
Law Offices of Robert S. Gitmeid & Associates, PLLC
P.O. Box 248
Mableton, GA 30126

Respectfully submitted this 23rd day of January 2023.

BEDARD LAW GROUP, PC

/s/ Jonathan K. Aust

Jonathan K. Aust

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Attorney for The Bank of Missouri